

MOSER LAW FIRM, P.C.



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June 5, 2020

**VIA ECF**

Hon.. Joan M. Azrack, U.S.D.J.  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

RE: *Adkins v. Garda CL Atlantic, Inc.*, 16-cv-00641

Dear Judge Azrack:

The parties have conferred regarding a briefing schedule for the anticipated motions to vacate and remand. However, the parties are discussing limited pre-motion discovery. Therefore, we respectfully request until June 8, 2020 to submit a proposed briefing schedule and pre-motion discovery scheduling order.

Respectfully submitted,

/s/

Steven J. Moser